

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	CRIMINAL NO. 05-30057-MAP
)	
DARRYL BURNS, and)	
NAOMI WATFORD)	
)	
Defendants.)	

THE PARTIES' JOINT STATUS
REPORT PURSUANT TO LOCAL RULE 116.5(A)

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, and Edward B. Fogarty, attorney for Darryl Burns, and Myles Jacobson, attorney for Naomi Watford, hereby submit the following status report pursuant to Local Rule 116.5(A) and Magistrate Judge Neiman's written order.

1. Counsel for Ms. Watford requested additional discovery on the basis that the government's automatic discovery was incomplete. Counsel and the government have since reviewed the discovery together and the government has responded to Counsel's discovery letter. Counsel has submitted a second discovery letter dated November 7, 2005. The government will respond to the letter within fourteen days. The government previously agreed to disclose the identity of the cooperating witness to defense counsel by November 10, 2005. The government still

intends to do so. Counsel for Ms. Watford anticipates requesting additional discovery once he receives that information.

2. Counsel for Darryl Burns has requested his own copies of consensual recordings and the government has agreed to prepare additional copies by November 10, 2005. There are no pending requests for discovery from Mr. Burns at this time.

3. The government states that a motion date should be established under Fed.R.Crim.P. 12(c).

4. The parties agree that the time from arraignment, through the present is excludable from the Speedy Trial Act pursuant to 18 U.S.C. Section 3161(h)(8)(A) and Local Rule 112.2(A)(1), (2), and (3). Accordingly, the government requests that the Court issue an order indicating that the time from arraignment to the present is excludable pursuant to Local Rule 112.2(B).

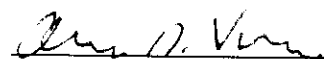
5. At this point, the parties, anticipate a trial in this case which will require approximately two weeks consisting of four hour trial days.

6. The parties agree that it is appropriate to schedule another status conference at this time.

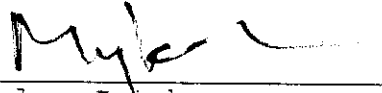
Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:


Ariane D. Vuono
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Edward B. Fogarty, Esq.
Attorney for Darryl Burns

Myles Jacobson, Esq.
Attorney for Naomi Watford

Dated: November 8, 2005